



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel

BY: Jin Lee *JK*
Acting Assistant General Counsel

Nicholas O. Mueller *NOM*
Attorney

CJ Pavia *CP*
Attorney

SUBJECT: MUR 7221 (Mepco Holdings, LLC, *et al.*)
Pre-Probable Cause Conciliation

I. INTRODUCTION

On March 7, 2017, the Commission found reason to believe that Mepco Holdings, LLC and Mepco, LLC (collectively, "Mepco") violated 52 U.S.C. §§ 30122 and 30116 by making contributions in the name of another and making excessive contributions.¹ The Commission also found reason to believe that James Laurita, Jr. and Karen Hughes knowingly and willfully violated 52 U.S.C. § 30122 by making contributions in the name of another or allowing their names to be used to effect such contributions.² After this Office submitted the Third General Counsel's Report describing the results of the investigation, on March 19, 2019, the Commission found reason to believe that James Laurita, Jr. violated 52 U.S.C. § 30116 by making excessive contributions and authorized the Office of the General Counsel to settle the violations on a non-

¹ Cert. ¶ 2(b)-(c), Pre-MUR 567 (MUR 7221) (Mepco Holdings, LLC, *et al.*) (Mar. 7, 2017).

² *Id.* ¶ 2(d).

1 knowing and willful basis through pre-probable cause conciliation as to Mepco, Laurita, and
2 Hughes.³

3 Attached are two signed conciliation agreements, negotiated with Mepco and Hughes,
4 and one signed by counsel for Laurita. The agreement with Laurita contains no changes from the
5 agreement previously approved by the Commission. For the reasons set forth below, we believe
6 the attached agreements represent a reasonable settlement of the violations in this matter and
7 recommend that the Commission accept the signed agreements.

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³ Cert. ¶ 3(a), (c), MUR 7221 (Mepco Holdings, LLC, *et al.*) (Mar. 19, 2019).

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III. RECOMMENDATIONS

1. Accept the attached signed conciliation agreements with Mepco Holdings, LLC, and Mepco, LLC; Karen Hughes; and James Laurita, Jr.;
2. Approve the appropriate letters; and
3. Close the file.

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